

1 MCGREGOR W. SCOTT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant U. S. Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700
8
9 Attorneys for the United States

10
11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14
15 UNITED STATES OF AMERICA,

16 Plaintiff,

v.

17 APPROXIMATELY \$48,500.00 IN U.S.
18 CURRENCY,

19 Defendants.

20 2:21-MC-00012-MCE-DB

21 STIPULATION AND ORDER EXTENDING TIME
22 FOR FILING A COMPLAINT FOR FORFEITURE
23 AND/OR TO OBTAIN AN INDICTMENT
24 ALLEGING FORFEITURE

25 It is hereby stipulated by and between the United States of America and potential claimants
26 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as
follows:

27 1. On or about September 23, 2020, the Homeland Security Investigations seized the above-
28 referenced defendant asset pursuant to a State search and seizure warrant (hereafter “defendant asset”).

29 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required
30 to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or
31 obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of
32 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
33 deadline is January 20, 2021.

34 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
35 April 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant asset and/or to obtain an indictment alleging that the defendant asset is subject to
2 forfeiture.

3 4. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant asset and/or to obtain an indictment
5 alleging that the defendant asset is subject to forfeiture shall be extended to April 20, 2021.

6 Dated: 1/20/2021

McGREGOR W. SCOTT
United States Attorney

8 By: /s/ Kevin C. Khasigian
9 KEVIN C. KHASIGIAN
10 Assistant U.S. Attorney

11 Dated: 1/19/2021

12 /s/ Mark J. Reichel
13 MARK J. REICHEL
14 Attorney for Potential Claimants
15 Xiaobing Wang, Min Guo, and Lianfeng Li
16 (Signature authorized by email)

17 IT IS SO ORDERED.

18 Dated: January 22, 2021

19 
20 MORRISON C. ENGLAND, JR.
21 SENIOR UNITED STATES DISTRICT JUDGE
22
23
24
25
26
27
28